DATE OUT: 6/5/2014

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X] BARCODE NO.: 419431 REG./FILE SYMBOL NO.: 85290-1

PRODUCT NAME: MicroGuard I MRID NOS: 469996-01, 469996-02, 471606-01, 471606-02, 472594-01,

482361-01, and 483494-01

COMPANY NAME: PMX Industries, Inc. ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist

Product Chemistry Team Risk Management and Implementation Branch V

Pesticide Re-evaluation Division (7508P)

THROUGH: Maria Rivera Piansay, Acting Team Leader

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TO: Bonnie Adler, CRM

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INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case No. 4025, was issued on 07/2006, and an Amended RED was issued on 05/2009 for the Active Ingredient Coppers. According to the RED, the generic database supporting the reregistration of Coppers for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Coppers RED, PMX Industries, Inc. provided EPA Form 8570-35 (Data Matrix), dated 05/16/2012; EPA Form 8570-4 (Confidential Statement of Formula), a basic formulation, dated 01/04/2013; a draft label, punch date 12/17/2012; and MRID Nos. 469996-01, 469996-02, 471606-01, 471606-02, 472594-01, 482361-01, and 483494-01. The registrant is requesting reregistration of the product, MicroGuard I, EPA Reg. No. 85290-1.

FINDINGS:

- 1. EPA Reg. No. 85290-1 is an end-use product containing the active ingredient Coppers, with a label claim nominal concentration of 96.2%, and other ingredients content of 3.8%. The product is for use in manufacturing and fabrication of touch surface components for use in various public, commercial, and residential buildings. The product is produced by an integrated system.
- 2. The CSF for the basic formulation is acceptable. The nominal concentration of the active ingredient agrees with that on the label, meeting PR Notice 91-2. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
- 3. Data reported in MRID Nos. 469996-01, 469996-02, 471606-01, 471606-02, 472594-01, 482361-01, and 483494-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
- 4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. There are no data present that would trigger Physical or Chemical Hazards statements. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 85290-1.

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled	
.1550 Product Identity and Composition	158.320	CSF, 469996-01, and 472594-01	Y	
.1600 Description of Materials Used to Produce the Product	158.325	469996-01	Y	
.1620 Description of Production Process	158.330		N/A	
.1650 Discussion of Formulation Process	158.165		N/A	
.1670 Discussion of Formation of Impurities	158.167	469996-01	Y	
.1700 Preliminary Analysis	158.345		N/A	
.1750 Certified Limits	158.350	482361-01 and 483494-01	Y	
.1800 Enforcement Analytical Method	158.355	469996-01	Y	

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	PR Notice 92-5		N/A
.6303 Physical State	Solid	469996-02	Y
.6304 Odor	PR Notice 92-5		N/A
.6313 Stability	The product is not TGAI/MP		N/A
.6314 Oxidation/Reduction Chemical Incompatibility	The product is not oxidizer/reducer.	469996-02 and 471606-01	Y
.6315 Flammability/Flame Extension	The product is not flammable.	469996-02 and 471606-01	N/A
.6316 Explodability	The product is not potentially explosive.	469996-02 and 471606-01	N/A
.6317 Storage Stability	Molecules of the product are stable.		W
.6319 Miscibility	The product cannot be miscible with water	469996-02 and 471606-01	N/A
.6320 Corrosion Characteristics	The product does not react with packaging material	469996-02 and 471606-01	W
.6321 Dielectric Breakdown Voltage	The product is not intended to be used around electrical equipment	469996-02 and 471606-01	N/A
.7000 pH	The product is not miscible with water.	469996-02 and 471606-01	N/A
.7050 UV/ Visible Light Absorption	Not applicable. The product is not TGAI/MP.		N/A
.7100 Viscosity	The product is solid.	469996-02	N/A
.7200 Melting Point	Not applicable. The product is not TGAI/MP.		N/A
.7220 Boiling Point	Not applicable. The product is not TGAI/MP.		N/A
.7300 Density/Bulk Density	7.21 to 9.41 g/cm ³	469996-02 and 471606-01	Y
.7370 Dissociation Constant in Water	Not applicable. The product is not TGAI/MP.		N/A
.7550 Octanol/ Water Partition Coefficient	Not applicable. The product is not TGAI/MP.		N/A
.7840 Solubility to Water and Organic Solvents	Not applicable. The product is not TGAI/MP.		N/A
.7950 Vapor Pressure	Not applicable. The product is not TGAI/MP.		N/A

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived

